

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DAVID KRAMER, Individually, and as the)
President and Sole Owner of CERTIFIED)
CAR SALES, LLC., a Missouri Limited)
Liability Company,)

Plaintiff,)

v.)

Case No. 08 CV 2530

SHERIFF'S DEPUTY STEVEN STELTER;))
Individually and as a Deputy of the)
DuPage County Sheriff's Office; JOHN P.)
CREEDON, Individually and as Director)
Of the Tri-County Auto Theft Unit;)
MICHAEL J. COLANDO, deceased,)
Individually and as a member of PUGI)
KIA, LLC and as the President and sole)
Owner of D & M AUTO SALES, INC.;)
DOMINIC L. PUGLIANI, Individually,)
and as a member of PUGI KIA, LLC;)
LARRY M. HALL, Individually and as a)
Manager of PUGI KIA, LLC; ANTHONY)
J. COLANDO, Jr., Individually and as a)
Manager of PUGI KIA, LLC; ANTHONY)
J. COLANDO, Sr., not individually but as)
named executor in his capacity as executor)
of the estate of MICHAEL J. COLANDO,)
deceased; DOMINIC MANCINI,)
Individually and as an attorney; PUGI KIA,)
LLC; D & M AUTO SALES, INC.; KIA)
MOTORS AMERICA, INC.;)
VW CREDIT, INC.,)

Defendants.)

Judge Castillo
Magistrate Judge Keys

**DEFENDANTS LARRY HALL, DOMINIC MANCINI AND PUGI KIA, LLC'S
MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants LARRY HALL, DOMINIC MANCINI, and PUGI KIA, LLC by their
attorneys, KELLY & KING, P.C., respectfully moves this Court for a 45-day extension of time

within which to answer or otherwise plead to the complaint filed in the above captioned case. In support of this motion, Hall, Mancini and Pugi Kia, LLC state as follows:

1. On May 2, 2008, Plaintiffs filed their Verified Complaint at Law in the above captioned matter. Defendants Hall and Mancini have been served in this case and Defendant, Pugi Kia, LLC has purportedly been served.

2. Subsequently, Kelly & King, P.C. was retained to represent Hall, Mancini and Pugi Kia, LLC and on May 23, 2008 filed appearances on behalf of these three Defendants.

3. The Plaintiffs' complaint is 108 pages long and consists of 45 counts in 525 paragraphs which describe multiple complicated financial transactions involving the purchase, sale and titling of numerous automobiles and which allege Wire Fraud, Mail and Wire Fraud, Section 1983 violations, RICO violations, common law fraudulent misrepresentation, breach of contract, conversion, tortious interference with business expectancy and promissory estoppel. The complaint is filed against 12 defendants, four of which are corporations.

4. Defendants need time to investigate the complaint's allegations in order to properly respond to them.

WHEREFORE, Defendants LARRY HALL, DOMINIC MANCINI AND PUGI KIA, LLC respectfully request that the Court grant its motion for a 45-day extension of time within which to answer or otherwise plead in this case:

Respectfully submitted,

s/ Paul E. Kelly
One of the Attorneys for Defendants
LARRY HALL, DOMINIC MANCINI and
PUGI KIA, LLC

Paul E. Kelly, ARDC No. 1437356
David L. King, ARDC No. 3128899
M. Kellett McConville, ARDC No. 6290167
KELLY & KING, P.C.
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312-553-5290
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PROOF OF SERVICE

I, Paul E. Kelly, attorney for Defendants Larry Hall, Dominic Mancini and Pugi Kia, LLC, certify that I have served a copy of the foregoing **DEFENDANTS LARRY HALL, DOMINIC MANCINI AND PUGI KIA, LLC'S MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD** to:

Stephen M. Komie
KOMIE AND ASSOCIATES
One North LaSalle Street, Suite 4200
Chicago, Illinois 60602

electronically on May 23, 2008 at or before 5:00 p.m.

s/ Paul E. Kelly
One of the Attorneys for Defendants
LARRY HALL, DOMINIC MANCINI and
PUGI KIA, LLC

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